

Message

From: Mednick, Richard [Mednick.Richard@epa.gov]
Sent: 12/9/2019 7:57:37 PM
To: Cora, Lori [Cora.Lori@epa.gov]; Allen, Elizabeth [allen.elizabeth@epa.gov]
Subject: RE: Oregon Risk Rules

Excellent to know, thank you both.

Ex. 5 AC/DP

Ex. 5 AC/DP

Richard

From: Cora, Lori <Cora.Lori@epa.gov>
Sent: Monday, December 9, 2019 11:52 AM
To: Mednick, Richard <Mednick.Richard@epa.gov>; Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: RE: Oregon Risk Rules

At Portland Harbor we identified the 10-5 cumulative, 10-6 individual cleanup standards are ARAR. However, there were state cleanup regs adopted under their cleanup law that we did not find were ARAR. The ARAR tables for Portland Harbor and our internal memo for finding that their hot spot regs. were not ARAR should be in the sharepoint site that Allison Hiltner put together for the ARAR group effort. I'm on travel today but if you want to discuss I am back in the office tomorrow.

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From: Mednick, Richard <Mednick.Richard@epa.gov>
Sent: Monday, December 09, 2019 11:36 AM
To: Cora, Lori <Cora.Lori@epa.gov>; Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: Oregon Risk Rules

Lori and Elizabeth,

For the Bradford Island Site (which may be proposed for the NPL), the Army Corps of Engineers believes that Oregon risk assessment rules (OAR 340-122-0084 & 340-122-0115) would not be ARARs because the rules do not contain cleanup standards and do not address a particular contaminant, action or location. Those rules prescribe an acceptable risk level of 1×10^{-6} for individual carcinogens and 1×10^{-5} for multiple carcinogens. The Oregon rules look pretty similar to MTCA which I think we have always treated as ARARs for Washington sites. Do you know whether we have considered these Oregon rules ARARs for Oregon sites?

Thank you,

Richard

Richard Mednick
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